

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.
04-11314 PBS

ST. PAUL TRAVELERS, as successor in
interest to ATLANTIN MUTUAL
INSURANCE CO. Marine Division, subrogee
of IBEX LLC, and IBEX, LLC,

Plaintiffs,

v.

FAIRHAVEN SHIPYARD, INC. and A.I.
MARINE ADJUSTERS, INC., a member of
AMERICAN INTERNATIONAL GROUP,
INC.

Defendant,

**ASSENTED-TO MOTION OF THE DEFENDANT, A.I. MARINE
ADJUSTERS, INC., TO EXTEND THE TIME TO ANSWER OR
OTHERWISE RESPOND TO THE PLAINTIFFS' COMPLAINT**

The defendant, A.I. Marine Adjusters, Inc., respectfully moves, **with the assent of the plaintiffs**, to extend the time for it to answer or otherwise respond to the plaintiffs' Complaint up to and including July 31, 2004. Counsel for the plaintiffs assented to this motion on July 8, 2004. In support thereof, the defendant states as follows:

1. The plaintiffs' Complaint was served on A.I. Marine Adjusters, Inc. on or about June 18, 2004;

2. Upon information and belief, prior counsel was assigned to this matter, but had a conflict of interest;
3. Taylor, Duane, Barton & Gilman, LLP was asked to represent A.I. Marine Adjusters, Inc. on July 6, 2004;
4. Taylor, Duane, Barton & Gilman, LLP completed its conflicts check on July 7, 2004 and determined no conflict of interest exists;
5. Upon information and belief, a representative of both defendants had previously contacted the plaintiffs' counsel, William Hewig, III, regarding an extension of time to answer or otherwise respond to the complaint, and Mr. Hewig had agreed to extend the time to answer for both defendants until July 31, 2004;
6. The allowance of this motion will not prejudice any party.

WHEREFORE, the defendant, A.I. Marine Adjusters, Inc., respectively requests an extension up to and including July 31, 2004, to answer or otherwise respond to the plaintiffs' complaint.

The Defendant,

The Plaintiffs,

A.I. MARINE ADJUSTERS, INC., ST. PAUL TRAVELERS, et al.

By its Attorneys,

By its Attorneys,



James J. Duane, III

B.B.O. # 136500

Robert M. Elmer

B.B.O. # 640269

Taylor, Duane, Barton
& Gilman, LLP

111 Devonshire Street

Boston, MA 02109

(617) 654-8200



William Hewig, III

B.B.O. # 541910

Kopelman and Paige, P.C.

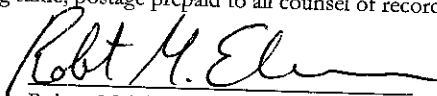
31 St. James Avenue

Boston, MA 02116-4102

(617) 556-0007

CERTIFICATE OF Rule 7.1 CONFERENCE AND OF SERVICE

I, Robert M. Elmer, hereby certify that, prior to filing the within motion, I conferred with counsel for the plaintiff concerning said motion, who advised that the plaintiffs assent to said motion. I further certify that on this 8th day of July, 2004, I served a copy of the above motion by mailing same, postage prepaid to all counsel of record.



Robert M. Elmer